

Complaint of the Greeting Card Association

Docket No. C2020-2

ATTACHMENT I

This Attachment contains GCA's discussion of the evidentiary questions required by sections 3030.10(a)(5) and (6) of the Rules of Practice.

A. Evidence to be presented by GCA

GCA has filed with this Complaint the following exhibits:

Exh. 1A	Household Mailing Budgets
Exh. 1B	Mail Sent by Households
Exh. 2	Examination of Meter Manufacturers (Marketing)
Exh. 3	"Other" Indicia vs. Net Single-Piece Letters
Exh. 4	Metered vs. Non-Metered Letters – Mail Processing Volume Variable Cost and Metered Letter Differential
Exh. 5	Estimation of Total Mail Processing Cost – Stamped and Metered Letters
Exh. 6	Difference in Delivery Cost – Stamped and Metered Letters
Exh. 7	Stamped Letter and Metered Letter Volume Trends
Exh. 8	FY 2014 Single-Piece Letter Indicia by Quarter
Exh. 9	Rate and Revenue Effects of Correcting Discrimination
Exh. 10	Rate and Revenue Effects of Correcting Discrimination
Exh. 11	Rate and Revenue Effects of Equal Price-Cap Increases

All these exhibits are based on publicly available data. Postal Service data reports used in them are:

POSTAL SERVICE DOCUMENT	USED IN GCA EXHIBIT ____
Revenue, Pieces and Weight by Shape and Indicia Report	3 (and Table A in the Complaint), 8
Market-Dominant Billing Determinants	1B, 7, 9, 10, 11
Household Diary Study reports	1A, 1B
ACR dockets – USPS LR-26	4, 5
ACR2018 – USPS LR-31	5
ACR2018 – USPS LR-43	5

In addition, Docket ACR2019, LR-USPS-FY2019-29 is used on p. 11 of the Complaint.

Other publicly available sources used are:

SOURCE	USED IN GCA EXHIBIT ____
Various manufacturer websites, cited (with links) in the Exhibit	2
ACR2018 PRC LR-1	5
ACR2018 PRC LR-3	5
ACR2018 PRC LR-8	5, 6

B. Other evidentiary material to be sought by GCA

At the time of filing this Complaint, GCA is aware of one category of information to be sought by discovery or other appropriate means.

While GCA believes that the data available to it and presented in this Complaint would allow a well-founded conclusion that the Metered Letter rate for Single-Piece First-Class Letters has not succeeded as a promotion of postage meter usage (see section II.F. of the Complaint), a further appropriate inquiry is whether the Postal Service

has experienced a net increase or decrease in the number of postage meter accounts in the period during which the Metered Letter rate has been effective. If there has been no material increase in the number of postage meter accounts, this fact would further tend to show that the promotional goal of the Metered Letter rate has not been achieved, and that this rate is therefore unreasonable – and contributory to an undue and unreasonable discrimination – within the meaning of 39 U.S.C. sec. 403(c).

To GCA's knowledge, this information is not publicly available. GCA would accordingly propound that inquiry, which would be written so as not call for disclosure of any facts regarding individual account holders (e.g., their identity, their mailed volumes or account balances, or the number, brand, or size of meter(s) used) or any individual meter manufacturer or meter model. At present, it seems necessary only to request the total number of accounts, the number of new accounts, and the number of discontinued accounts, for each quarter of the period since the institution of the Metered Letter rate in 2014.